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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ADEL HASSAN HAMAD,

Petitioner,

v.

GEORGE W. BUSH, DONALD
RUMSFELD, JAY HOOD, and BRICE
GYURISKO,

Respondents.

CV 05-1009 JDB

PETITIONER'S OBJECTION TO
EXPEDITED BRIEFING SCHEDULE
REGARDING SEIZURE OF PAPERS
FROM DETAINEES

Petitioner Adel Hassan Hamad, a Guantánamo detainee, by and through the undersigned counsel, objects to the government's request for an expedited briefing schedule on the government's motion relating to the seizure of detainee paperwork. Instead of responding to the government's motion by Monday, July 17, as the

government requests, Petitioner can file his response on or before Friday, July 21, which would be the normal response date.

More specifically, on the afternoon of Friday, July 7, the government filed its Respondents' Motion For Procedures Related To Review Of Certain Detainee Materials And Request For Expedited Briefing. In that Motion, the government explained that it had seized all paperwork from the cells of all detainees, and requested that the Court authorize procedures to ratify that seizure and allow the government to read, using a filter team, all the attorney-client materials which the government had seized. The government's Motion also requested that the Court order expedited briefing so that Petitioner's responsive pleading would be due on Monday, July 17. Under Court rules, the response would otherwise be due on or by Friday, July 21.

The Federal Public Defender for the District of Oregon represents seven detainees whose paperwork has apparently been seized, each of whose circumstances are different. Because of the logistics, counsel is unable to communicate with any of them given the short time frame to confirm any details or develop any facts. Although counsel has worked diligently in preparing a response to the Motion, preparation will require the full time allowed by court rules, and counsel will be unable to reply within the expedited time requested by the government, especially taking into account the importance and complexity of the issues, the need to coordinate the individual circumstances of seven different clients, and the need to coordinate with other counsel across the country who were served with the same government Motion.

Counsel anticipates being able to file a response to the government's Motion on

or before Friday, July 21. Counsel objects to a briefing schedule which would require an earlier response.

Respectfully submitted this 17th day of July, 2006.

/s/ Steven T. Wax
Steven T. Wax
Federal Public Defender

/s/ Patrick J. Ehlers
Patrick J. Ehlers
Assistant Federal Public Defender